

Videotaped Deposition of Max Salas
Conducted on February 24, 2016

11 (Pages 41 to 44)

<p style="text-align: right;">41</p> <p>1 believe the owner to be a trust known as 1610 Salas</p> <p>2 Trust; is that correct?</p> <p>3 A That may be what it says, but that's not</p> <p>4 what I know.</p> <p>5 Q Then in your similar answer to</p> <p>6 interrogatory 3 in the Brekelmans set, you contend</p> <p>7 some other person is the owner of the property in</p> <p>8 question and you believe that to be the trust known</p> <p>9 as 1610 Salas Trust?</p> <p>10 A Are you asking are these two different</p> <p>11 answers to the same question?</p> <p>12 Q I am asking if I have correctly</p> <p>13 identified your sworn answer to those two questions.</p> <p>14 A My smart answer?</p> <p>15 Q Sworn.</p> <p>16 A Oh, my sworn. Are you asking if that's</p> <p>17 the same question and I have answered different</p> <p>18 ways?</p> <p>19 MR. BARNES: No, he's not he's asking if</p> <p>20 that was your answer to both of those questions.</p> <p>21 A The answer is here and I signed it. If</p> <p>22 it means something that I thought it meant at the</p>	<p style="text-align: right;">43</p> <p>1 trust is it?</p> <p>2 A I believe it's my son's and mine.</p> <p>3 Q I'm going to come to CLR in a minute</p> <p>4 that's not what the answer says, and I'm going to</p> <p>5 ask you what is the 1610 Salas Trust. Why did you</p> <p>6 identify it here?</p> <p>7 A Okay. So because when people paid their</p> <p>8 rent, they made the rent out to CLR --</p> <p>9 Q I didn't ask you who CLR is, sir. I am</p> <p>10 going to come to that.</p> <p>11 A Do you understand did I just tell you CLR</p> <p>12 Trust?</p> <p>13 Q But both answers identify 1610 Salas</p> <p>14 Trust so I'm asking you is there such an entity.</p> <p>15 A So this is wrong.</p> <p>16 Q There is no 1610 Salas Trust?</p> <p>17 A There is a 1610 Trust doing business as</p> <p>18 CLR.</p> <p>19 Q When was the trust created?</p> <p>20 A I don't recall.</p> <p>21 Q Who created the trust? In other words,</p> <p>22 who is the seller who transferred the properties to</p>
<p style="text-align: right;">42</p> <p>1 time, I can tell you that nobody owns that property</p> <p>2 but me.</p> <p>3 Q You are not the legal owner of the</p> <p>4 property, are you?</p> <p>5 A Yes, I am, sir.</p> <p>6 Q Are you identified in any record in the</p> <p>7 District of Columbia as the owner of the property?</p> <p>8 A I don't know but I know I own it.</p> <p>9 Q Are you identified on any document of any</p> <p>10 governmental authority identifying you as the owner</p> <p>11 of the property?</p> <p>12 A I don't know that, sir, but I know I own</p> <p>13 it.</p> <p>14 Q You know that the records identify your</p> <p>15 son Len Salas as the owner; isn't that true?</p> <p>16 A I don't know that, sir, but I now I own</p> <p>17 it.</p> <p>18 Q Who is the 1610 Salas Trust? What is it?</p> <p>19 A I don't know -- I mean it's a trust</p> <p>20 that -- there's a trust called CLR, CLR Trust, it's</p> <p>21 our trust.</p> <p>22 Q You say our trust. Who is "our"? Whose</p>	<p style="text-align: right;">44</p> <p>1 the trustee?</p> <p>2 A I don't know the answer to who is the</p> <p>3 trustee.</p> <p>4 Q That is the person who was holding the</p> <p>5 property for the beneficiary?</p> <p>6 A I believe I am, but I'm not sure.</p> <p>7 Q Who is the beneficiary of the trust</p> <p>8 that's the person for whose benefit the property is</p> <p>9 being held?</p> <p>10 A Isn't that the same question?</p> <p>11 Q No. I asked you who was the trustee that</p> <p>12 is the person holding the property for the benefit</p> <p>13 of a beneficiary and you said you thought it was you</p> <p>14 but you are not sure, correct?</p> <p>15 A So what's the other question?</p> <p>16 Q The other question is who is the</p> <p>17 beneficiary, for whose benefit is the property being</p> <p>18 held?</p> <p>19 A I mean I don't know. I mean I know what</p> <p>20 I think but I don't know.</p> <p>21 Q What do you think?</p> <p>22 A I think it's my property.</p>